

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

AUTOSCRIBE CORPORATION	§	
	§	
v.	§	Case No. 2:23-cv-0349-JRG
	§	(Lead Case)
REPAY HOLDINGS CORPORATION, et al.	§	JURY TRIAL DEMANDED
	§	

AUTOSCRIBE CORPORATION	§	
	§	
v.	§	Case No. 2:23-cv-0364-JRG
	§	(Member Case)
FORTIS PAYMENT SYSTEMS, LLC	§	
	§	

JOINT MOTION FOR ENTRY OF AGREED DISCOVERY ORDER

Plaintiff Autoscribe Corporation (“Autoscribe” or “Plaintiff”) and Defendants Repay Holdings Corporation, Repay Holdings, LLC, and Fortis Payment Systems, LLC, (collectively, “Defendants”), hereby jointly submit this motion seeking entry of the Agreed Discovery Order, attached as Exhibit A. The parties jointly request that the Court enter the Agreed Discovery Order.

Dated: December 19, 2023

Respectfully submitted,

/s/ Jason McManis

Jason McManis (SBN# 24088032)
Colin Phillips (SBN# 24105937)
Chun Deng (SBN# 24133178)
Angela Peterson (SBN# 24137111)
Ahmad, Zavitsanos & Mensing, PLLC
1221 McKinney Street, Suite 2500
Houston, Texas 77010
(713) 655-1101
jmcmanis@azalaw.com
cphillips@azalaw.com
cdeng@azalaw.com
apeterson@azalaw.com

Andrea L. Fair (SBN# 24078488)
Ward, Smith, & Hill, PLLC
1507 Bill Owens Parkway
Longview, Texas 75604
(903) 757-6400
(903) 757-2323 (fax)
andrea@wsfirm.com

Attorneys for Autoscribe Corporation

/s/ David H. Harper (w/permission)

David H. Harper
Texas Bar No. 09025540
david.harper@haynesboone.com
Stephanie N. Sivinski
Texas Bar No. 24075080
stephanie.sivinski@haynesboone.com
Marron E. Frith
NY Bar No. 5870803
marron.frith@haynesboone.com
HAYNES AND BOONE, LLP
2323 Victory Avenue, Suite 700
Dallas, Texas 75219
(214) 651-5000 (telephone)
(214) 200-0615 (fax)

***Attorneys for Repay Holdings
Corporation and Repay Holdings, LLC***

/s/ Elizabeth M. Chiaviello (w/permission)
Elizabeth M. Chiaviello (SBN# 24088913)
elizabeth.chiaviello@morganlewis.com
Morgan, Lewis & Bockius, LLP
1717 Main Street, Suite 3200
Dallas, Texas 75201
T: 214.466.4000
F: 214.466.4001

C. Erik Hawes (SBN# 24042543)
Erik.hawes@morganlewis.com
Cullen G. Pick (SBN# 24098260)
cullen.pick@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
1000 Louisiana Street, Suite 4000
Houston, Texas 77002-5006
T: 713.890.5000
F: 713.890.5001

*Attorneys for Defendant
Fortis Payment Systems, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was filed electronically in compliance with Local Rules CV-5(a) on December 19, 2023. As such, this document was served on all counsel of record pursuant to Local Rules CV-5(a)(3)(A) and the Federal Rules of Civil Procedure.

/s/ Jason McManis
Jason McManis

CERTIFICATE OF CONFERENCE

The parties have met and conferred on December 18, 2023 to discuss the relief requested in this Motion. This motion is agreed and filed jointly by the parties.

/s/ Jason McManis
Jason McManis